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Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW.  
Washington, DC 20554

**Subject: CC Docket No. 92-105; FCC 04-111**  
***The Use of N11 Codes and Other Abbreviated Dialing Arrangements***

Dear Ms. Dortch:

We would like to congratulate the Commission on their willingness and desire to move expeditiously towards assigning and implementing a nationwide 3 digit number for access to our nation's 62 One Call centers.

In addition to being in the best interest of our nation, implementing a nationwide 3 digit telephone number is required by the Public Law 107-355, the Pipeline Safety Improvement Act of 2002. This act was signed into law by President Bush on December 17, 2002.

As previously stated in our letter dated November 4, 2003, the Common Ground Alliance (CGA) and the 15 stakeholder groups represented by the CGA will support the implementation of any 3 digit number deemed appropriate by the FCC.

We also support the continued use of "#344" in the wireless community, in addition to the 3 digit number chosen by the FCC. We believe this number should be available as an alternative to the new 3 digit number for as long as the wireless community chooses to support this number. The wireless community deserves to be recognized and congratulated for their

leadership in the movement to provide abbreviated dialing to their users in order to reduce damages to underground infrastructure, personal injuries, and deaths.

We can not support the use of a shared (dual use), 3 digit number. The CGA estimates that the 62 One Call centers currently receive 15,000,000 calls annually. We also estimate that some 40% of damages to buried utilities were caused by those who did not call before digging. The potential incoming call volume to One Call centers over the next few years could well exceed 20 million. Adding an additional interface to callers could discourage the use of the service and reduce the effectiveness and purpose of the 62 centers.

We also can not support the use of a 10 digit number. One Call centers currently have 10 digit numbers. Converting to a new number would not benefit the country and would be rejected by most, if not all of the centers. Public Law (PL) 107-355 clearly mandated a 3 digit number be implemented.

Paragraph 16 of the Federal Register states in part that “...***When a caller dials the abbreviated dialing code, the carriers would translate the abbreviated dialing code into the appropriate toll-free or local number.***” This is an important aspect of the process. In locations such as Arizona, the One Call center (Arizona Blue Stake) receives nearly 50% of its calls through the local 7 digit number. To translate all of the 3 digit calls to a toll free 10 digit number would add an unnecessary cost burden to this center.

We congratulate and thank the Honorable Chris John for introducing and sponsoring 3 digit dialing as a provision to the “Pipeline Safety Improvement Act of 2002.” We congratulate the commissioners on their unanimous support of this endeavor. In his statement Commissioner Michael J. Copps states:

*“The very first sentence of the Communications Act states that the Act was written to make  
“available . . . a rapid, efficient, Nation-wide and world-wide telecommunications service . . .  
for the purpose of promoting safety of life and property through the use of wire and radio  
communication.” So our charge and authority are clear. Now the need is to move ahead  
expeditiously—to ensure that excavators everywhere can dig safely and avoid disrupting the  
nation’s essential services.”*

The 15 stakeholder groups represented by the CGA believe that the rapid implementation of this new 3 digit number will help reduce fatalities and injuries to Americans who excavate and also help reduce the estimated 400,000 damages to our infrastructure each year.

Respectfully,

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